



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

August 17, 2009

REPLY TO THE ATTENTION OF:

Mr. Jerry C. Winslow
Principal Environmental Engineer
Xcel Energy
414 Nicollet Mall (Ren. Sq. 8)
Minneapolis, Minnesota 55401

SR-6J

RE: Performance Standards for Pilot Test
Ashland/NSP Lakefront Superfund Site

Dear Mr. Winslow:

This letter is a follow up to our recent discussions regarding proposed performance standards for a pilot-scale project. A pilot-scale test of a dredging technology for contaminated sediment removal has been proposed for this site. Northern States Power Company (NSPW), (d.b.a. Xcel Energy) is proposing to use wet dredging to remove contamination from the site to achieve the site Remedial Action Objectives RAOs. The RAOs for the sediment portion of the site include the removal of NAPL (free product) as well as reaching the sediment Preliminary Remediation Goal (PRG) concentration of 9.5 parts per million (ppm) total PAHs.

NSPW has informed the United States Environmental Protection Agency (EPA) that they need performance standards for a wet dredge project (pilot test) in order to help them better determine the overall dredge costs. The EPA has consulted with the Wisconsin Department of Natural Resources (WDNR) on the appropriate performance standards for the proposed wet dredge pilot test. The effectiveness of the pilot test will be evaluated based on these performance standards. Therefore, based on risk, site specific conditions, and proposed future use of the site, the performance standards provided below will be required for the wet dredge pilot test.

1. All NAPL source material shall be removed
2. All sediments with a PAH concentration above 9.5 ppm total PAHs shall be removed.
3. Upon completion of removal activities a surface weighted average of 9.5 ppm total PAHs will be achieved with no sample exceeding 22 ppm total PAHs (WDNR Probable Effects Concentration).
4. Surface water quality standards, as identified as ARARs, must not be exceeded outside the containment area including releases of NAPL sheens and/or turbidity.
5. Surface water quality standards, as identified as ARARs, will be achieved prior to any water within the containment area being released to the larger water body.
6. Air quality standards identified as ARARs must not be exceeded outside the exclusion zone (work/handling) or during the transport of contaminated media.

7. All permitting requirements, if necessary, are followed.
8. Sediment, wood debris, NAPL, carriage and contact water, and waste generated by the project will be managed to prevent the release of contaminants and potential contamination of site to land and waters.
9. Following the achievement of the sediment cleanup performance standards the lakebed at the site will be restored with a suitable granular material (sand/gravel) approved by EPA.
10. If the waste generated during the pilot test is to be discharged to a publicly-owned treatment system, it should meet all requirements set forth in the permit including pretreatment standards.
11. Appropriate measures to control airborne particulate matter should be taken during the pilot test.
12. Local, state, and federal noise pollution requirements should be met.
13. All investigation derived waste should be handled in accordance with EPA guidance and should meet EPA's offsite rule.

If you have any questions, please contact me at (312) 886-1999.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Hansen", written in a cursive style.

Scott K. Hansen
Remedial Project Manager

cc: Jamie Dunn, WDNR
Omprakash Patel, Weston Solutions, Inc.
Steven Laszewski, Foth